

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

PIONEER SERVICES, INC., )

Plaintiff, )

v. )

AUTO-OWNERS INSURANCE )  
COMPANY, INC., )

Defendant. )

2006 NOV 30 P 3:51

DEBRA P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA  
CIVIL ACTION NO. 2:06-cv-377-WKW

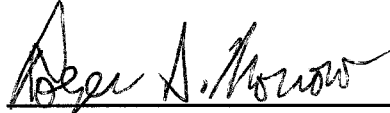
**MOTION OF DEFENDANT AUTO-OWNERS INSURANCE COMPANY FOR LEAVE  
TO AMEND ANSWER TO AMENDED COMPLAINT**


**COMES NOW** Defendant, Auto-Owners Insurance Company (Auto-Owners) and moves this Honorable Court for an order granting Auto-Owners leave to amend Auto-Owners answer filed on or about January 20, 2006, and for grounds shows unto the Court as follows:

1. That attached to this motion as Exhibit "A" is Defendant Auto-Owners' Amended Answer of Defendant Auto-Owners Insurance Company to Amended Complaint.
2. That the amended answer is for the purpose for asserting with more specificity Defendant's defenses in this action.
3. That the granting of this motion will not delay the disposition of this action.
4. That this motion and amendment are filed within the deadline for amendment of pleadings provided in the Court's scheduling order herein.
6. The amended answer of Defendant Auto-Owners to amended complaint is attached hereto as Exhibit "A".

**WHEREFORE** Defendant Auto-Owners Insurance Company, moves this Honorable Court for leave to amend its answer to amended complaint previously filed in this action.

DATED this the 30<sup>th</sup> day of November, 2006.

  
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**ROGER S. MORROW (MOR032)**

  
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**JOEL H. PEARSON (PEA019)**  
**ATTORNEYS FOR DEFENDANT**  
**AUTO-OWNERS INSURANCE COMPANY**

**OF COUNSEL:**


**MORROW, ROMINE & PEARSON, P.C.**  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the above and foregoing upon the following by placing a copy of same in the United States mail, first class postage prepaid on this the 30<sup>th</sup> day of November, 2006.

Leland Enzor, Jr., Esq.  
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**OF COUNSEL**